

2:21-cv-1430 RSL

From: [Vanessa Wellness](#)
To: [WAWDdb_NewCasesTac](#); [WAWDdb_NewCasesSea](#)
Subject: Pro Se complaint
Date: Monday, October 18, 2021 4:25:33 PM

CAUTION - EXTERNAL:

Jury trial: No
Plaintiff: Diana Wierzchos
Defendants:
Anthony Mendez and Swarovski

I. PARTIES

A. Plaintiff

Name: Diana Wierzchos
Street address: 4120 E Silver Springs Blvd
City and county: Marion county
State and zip code: Florida 34470
Telephone number [941-323-8575](#)

B. Defendants

Defendant no. 1

Name: Anthony Mendez
Job or title: manager
Address: unknown
Telephone number: unknown

Defendant no. 2

Name: Swarovski
Job or title: employer
Address: 1 Kenney Drive
Cranston, RI 02920
Phone number: [\(800\) 289-4900](#)

II. BASIS FOR JURISDICTION

Federal question

A. If the basis for jurisdiction is a federal question

List the specific federal statutes of the United States constitution that are at issue in this case

13th amendment. 18 U.s.c. 1595 Debt bondage, peonage, and/or involuntary servitude. Civil remedy against labor trafficking. Trafficking victims protection act.

III. Statement of claim

Anthony Mendez, manager at Swarovski palm beach in 2014, withheld 15 days pay, travel expenses incurred while opening the new store, and vacation pay. He violated my civil right to privacy during shift in March 2014, he stole information without my consent. He read my paycheck after stepping in my space and ran out to go report it to another party. I was owed money for travel expenses, which were not received because he assumed "that's not your money!" He then knowingly scheduled me for work the next two weeks to pay for it, deliberately to pay for what he thought wasn't correct. He garnished my wages and future earnings owed and then asked me to work extra shifts so his manager could leave on vacation knowing he froze my wages. If I had known he was going to freeze my paycheck I wouldn't have worked the half months schedule. Consequently, I was forced to move in with a criminal because not received payment. Because Anthony Mendez and Swarovski illegally withheld and failed to pay the money I worked for. He was using debt bondage, peonage, and/or involuntary servitude for repayment what he assumed but did not investigate. He caused me to be homeless for weeks. Damages not limited to unpaid wages, but negatively imbalance other aspects such as mental health and lack control. Debt bondage when you're tricked into working for little or no pay. The money earned goes to pay off a loan.

IV. RELIEF

Approx. two weeks paycheck, travel expenses approx. 650 miles, approx. 20 hours vacation pay, other expenses

V. CERTIFICATION AND CLOSING

I certify that this complaint (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a non frivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support, or if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complied with the requirement of Rule 11.

I agree to provide the clerks office with any changes to my address where case related papers may be served. I understand that my failure to keep a current address on file with the clerks office may result in the dismissal of my case

Date signed: October 18, 2021

Signature: Diana Wierzchos

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